

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

AUTO-OWNERS INSURANCE,)	
)	
Plaintiff,)	Case No.: 1:19-cv-00066-SNLJ
)	
v.)	
)	
BLAIR LEASING, LLC,)	
)	
Defendant.)	

BLAIR LEASING, LLC,)	
)	
Counter-Plaintiff,)	
)	
v.)	
)	
AUTO-OWNERS INSURANCE,)	
)	
Counter-Defendant.)	

JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINE

COME NOW the parties, Plaintiff and Counter-Defendant Auto Owners Insurance Company (“Plaintiff”) and Defendant and Counter-Plaintiff, Blair Leasing, LLC (“Defendant”), and hereby submit the foregoing Joint Motion to Extend Scheduling Order Deadline (“Motion”) of the current Case Management Order [Please see Doc. 10]. In support thereof, the parties jointly state the following:

1. Per the Court’s Case Management Order, discovery must be completed in this case no later than April 30, 2020.
2. Per the Court’s Case Management Order, alternative dispute resolution must be completed by May 1, 2020.

3. In addition, the parties requested an extension up to and including March 31, 2020, to complete depositions of Defendant's expert witnesses, which was granted by this Court on February 13, 2020. [Please see Doc. 21].

4. Parties respectfully request a continuance for the aforementioned settings for 60 days, as the parties are still in the process of completing depositions.

5. At this time, parties have in good faith attempted to complete all of the necessary depositions and mediation.

6. In fact, the parties have completed all of the depositions of Plaintiff's experts and completed the depositions of two of Defendant's experts.

7. Furthermore, parties had arranged the depositions of Defendant's other two experts, both retained and non-retained, for March 26, 2020 in Denver, Colorado.

8. In addition, parties had arranged the depositions of Ellen and Doug Miller, owners of Blair Leasing, for March 25, 2020. These depositions were also supposed to occur in Denver, Colorado.

9. Parties had arranged mediation with Gary Snodgrass in St. Louis, Missouri for April 15, 2020.

10. Parties arranged the deposition of a Corporate Representative of Auto-Owners for April 16, 2020.

11. Counsel for Plaintiff are located in St. Louis, Missouri, while Counsel for Defendant is located in Oklahoma City, Oklahoma.

12. The parties' discovery efforts have been delayed by limitations and precautions put in place due to the recent Coronavirus outbreak.

13. All of these aforementioned events, require substantial travel efforts, requiring air travel, from both parties.

14. In addition, some of the parties are considered in the high risk category due to elderly age and underlying health conditions.

15. Therefore, traveling for and attending these depositions and/or mediation would be extremely problematic.

16. The parties affirm that this Motion is not submitted for the purposes of delay, and neither party will be prejudiced should the Court grant this Motion.

17. In sum, the parties request new deadlines for the following: complete discovery by June 30, 2020; complete depositions of Defendant's expert witnesses by May 31, 2020; and complete mediation by July 1, 2020.

WHEREFORE, premises considered, the parties respectfully request the Court grant this Motion to Extend Scheduling Order Deadline as referenced hereinabove.

Respectfully submitted,

/s/ J. Drew Houghton (with permission)

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was served by the Court's electronic filing system, this 19th day of March, 2020, on the counsel of record listed below.

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